

EXHIBIT 1

April 14-22, 2025, Email Communications

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April 14-22, 2025, Email Communications

Peter Keegan

From: Peter Keegan
Sent: Tuesday, April 22, 2025 1:51 PM
To: Luke Busby
Cc: lgorman@laurengormanlaw.com
Subject: RE: Case 3:25-cv-00129

Good afternoon,

Thank you for forwarding the proposed discovery plan and scheduling order we discussed last week. During the call I stated my objection, pursuant to Fed. R. Civ. P. 26(a)(1)(C), by requesting inclusion of the following provision in the plan:

“During the April 14, 2025, Fed. R. Civ. P. 26(f) conference, the City of Reno indicated its intention to seek a stay of this civil matter pending the outcome of the pending criminal matter against Co-Defendant Michael Tyler Baehr in Case No. 3:25-CR-00002-MMD-CSD.”

Based upon the City’s objection, the City has indicated it does not agree with your proposed discovery plan or the default 14-day timeframe for initial disclosures as set forth by Fed. R. Civ. P. 26(a)(1)(C). Based upon the City’s objection and stated intention to seek a stay, filing separate discovery plans is appropriate, and until the Court has determined whether this matter will proceed, stipulation to a protective order is premature.

Thank you,



Peter Keegan

Deputy City Attorney
Reno City Attorney’s Office
1 East First Street, 3rd Floor
P.O. Box 1900
Reno, NV 89505
775-334-2073 (Direct)

KeeganP@reno.gov

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From: Luke Busby <luke@lukeandrewbusbyltd.com>
Sent: Monday, April 21, 2025 1:20 PM
To: Peter Keegan <KeeganP@reno.gov>

Cc: Lauren Gorman <lgorman@laurengormanlaw.com>

Subject: Re: Case 3:25-cv-00129

Greetings,

We forwarded you the stipulated discovery plan as well as the proposed protective order a week ago. Despite seemingly agreeing to the contents of the proposed discovery plan you have not responded to my email requesting your consent to sign and file it. Nor have you responded to the draft of the proposed protective order.

Please let me know by the end of tomorrow whether you will stipulate or whether we will be required to file a separate discovery plan and motion for protective order.

Cheers!

On Mon, Apr 14, 2025 at 2:29 PM Luke Busby <luke@lukeandrewbusbyltd.com> wrote:

Greetings,

Please find attached the final proposed discovery plan and scheduling order. Please let me know if I have your consent to affix your e-signature and file.

Cheers!

On Mon, Apr 14, 2025 at 2:22 PM Luke Busby <luke@lukeandrewbusbyltd.com> wrote:

Here is the draft protective order..

On Mon, Apr 14, 2025 at 2:20 PM Peter Keegan <KeeganP@reno.gov> wrote:

FYI

Peter Keegan

Deputy City Attorney

Reno City Attorney's Office

1 East First Street, 3rd Floor

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From: Luke Busby <luke@lukeandrewbusbyltd.com>
Sent: Monday, April 14, 2025 1:52 PM
To: Peter Keegan <KeeganP@reno.gov>
Cc: Lauren Gorman <lgorman@laurengormanlaw.com>
Subject: Re: Case 3:25-cv-00129

Greetings,

Please find a draft discovery plan attached for today's call.

On Wed, Apr 2, 2025 at 2:08 PM Luke Busby <luke@lukeandrewbusbyltd.com> wrote:

Greetings,

Thanks, I'll send out a google meet invite.

Cheers!

On Wed, Apr 2, 2025 at 2:06 PM Peter Keegan <KeeganP@reno.gov> wrote:

Good afternoon, Mr. Busby:

I am available on April 14th at 2:00 p.m. Do you want to initiate the call?

Thank you,

Peter Keegan

Deputy City Attorney

Reno City Attorney's Office

1 East First Street, 3rd Floor

P.O. Box 1900

Reno, NV 89505

775-334-2073 (Direct)

KeeganP@reno.gov

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From: Luke Busby <luke@lukeandrewbusbyltd.com>

Sent: Wednesday, April 2, 2025 12:51 PM

To: Lauren Gorman <lgorman@laurengormanlaw.com>; Peter Keegan <KeeganP@reno.gov>

Subject: Case 3:25-cv-00129

Mr. Keegan,

I'm writing to see if you're available for the Rule 26 early case conference in the Bluth v. Baehr matter on April 14th at 2:00 p.m. Please let me know if this works for you.

Cheers!

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Cheers!

Luke Busby, Esq.

316 California Ave. #82
Reno, Nevada 89509
(775) 453-0112 (Dial Area Code)

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